

1 Your Name: Ronisha Sharde Gaines

2 Address: PO Box 6625 San Pablo, CA 94806

3 Phone Number: (925) 270-9205

4 Fax Number: _____

5 E-mail Address: Ronisha.gaines@outlook.com

6 Pro Se Plaintiff

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FILED

MAR -1 2024 *WM*

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NP

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Ronisha Sharde Gaines

Case Number C24-01279
[leave blank]

SI

Plaintiff,

COMPLAINT

vs.

WORDPRESS

DEMAND FOR JURY TRIAL

Yes ☐ No ☒

Defendant.

PARTIES

1. Plaintiff. [Write your name, address, and phone number. Add a page for additional plaintiffs.]

Name: Ronisha Sharde Gaines

Address: PO Box 6625 San Pablo, CA 94806

Telephone: (925) 270-9205

COMPLAINT

PAGE ____ OF ____ [JDC TEMPLATE – Rev. 05/2017]

2. Defendants. [Write each defendant's full name, address, and phone number.]

Defendant 1:

Name: WORDPRESS
 Address: 60 29th Street # 343 San Francisco, CA 94110
 Telephone: (415) 273-3049

Defendant 2:

Name: _____
 Address: _____
 Telephone: _____

Defendant 3:

Name: _____
 Address: _____
 Telephone: _____

JURISDICTION

[Usually only two types of cases can be filed in federal court, cases involving "federal questions" and cases involving "diversity of citizenship." Check at least one box.]

3. ☒ My case belongs in federal court
☒ under federal question jurisdiction because it involves a federal law or right.

[Which federal law or right is involved?] _____

☐ under diversity jurisdiction because none of the plaintiffs live in the same state as any of the defendants and the amount of damages is more than \$75,000.

COMPLAINT

PAGE ____ OF ____ [JDC TEMPLATE – Rev. 05/2017]

VENUE

[The counties in this District are: Alameda, Contra Costa, Del Norte, Humboldt, Lake, Marin, Mendocino, Monterey, Napa, San Benito, Santa Clara, Santa Cruz, San Francisco, San Mateo, or Sonoma. If one of the venue options below applies to your case, this District Court is the correct place to file your lawsuit. Check the box for each venue option that applies.]

4. Venue is appropriate in this Court because:

- ☒ a substantial part of the events I am suing about happened in this district.
- ☐ a substantial part of the property I am suing about is located in this district.
- ☐ I am suing the U.S. government, federal agency, or federal official in his or her official capacity and I live in this district.
- ☐ at least one defendant is located in this District and any other defendants are located in California.

INTRADISTRICT ASSIGNMENT

[This District has three divisions: (1) San Francisco/Oakland (2) San Jose; and (3) Eureka. First write in the county in which the events you are suing about happened, and then match it to the correct division. The San Francisco/Oakland division covers Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Sonoma counties. The San Jose division covers Monterey, San Benito, Santa Clara, Santa Cruz counties. The Eureka division covers Del Norte, Humboldt, Lake, Mendocino counties, only if all parties consent to a magistrate judge.]

5. Because this lawsuit arose in Contra Costa County County, it should be assigned to the San Francisco/Oakland Division of this Court.

STATEMENT OF FACTS

[Write a short and simple description of the facts of your case. Include basic details such as where the events happened, when things happened and who was involved. Put each fact into a separate, numbered paragraph, starting with paragraph number 6. Use more pages as needed.]

Someone hijacked my blog and I cannot regain access.
 The gmail account that I used has been hacked & discarded. The
 credit card I used to pay for the site has been compromised &
 placed in collections. I have my Government copyright certificate
 for my wordpress blog howthislotusbloomed.wordpress.com.

COMPLAINT

PAGE ___ OF ___ [JDC TEMPLATE - Rev. 05/2017]

1 CLAIMS

2 First Claim

3 (Name the law or right violated: 17 U.S.C 501 Infringement of Copyright)4 (Name the defendants who violated it: WORDPRESS)5 [Explain briefly here what the law is, what each defendant did to violate it, and how you were
6 harmed. You do not need to make legal arguments. You can refer back to your statement of facts.]7 The law is copyright infringement. I reached out to
8 wordpress to regain access to my site after having my
9 identity stolen & gmail account hacked. They were non
10 cooperative.11 I have been harmed financially due to not being able to
12 monetize the site since I cannot log in.13 I have my copyright certificate attached.
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COMPLAINT

PAGE ____ OF ____ [JDC TEMPLATE - 05/17]

DEMAND FOR RELIEF

[State what you want the Court to do. Depending on your claims, you may ask the Court to award you money or order the defendant to do something or stop doing something. If you are asking for money, you can say how much you are asking for and why you should get that amount, or describe the different kinds of harm caused by the defendant.]

I would like the court to demand that wordpress grants me access to my site by helping me change the login credentials & email address, using my copyright certificate as proof that I own the content.

DEMAND FOR JURY TRIAL

[Check this box if you want your case to be decided by a jury, instead of a judge, if allowed.]



Plaintiff demands a jury trial on all issues.

Respectfully submitted,

Date: 2/14/2024

Sign Name:

R. M.

Print Name:

Ronisha S. Gaines

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Shirley P. Matthews
United States Register of Copyrights and Director

Registration Number

TX 9-117-772

Effective Date of Registration:

May 07, 2022

Registration Decision Date:

May 10, 2022

Copyright Registration for a Group of Short Online Literary Works

Registration issued pursuant to 37 C.F.R. § 202.4(j)

Titles

Title of Group: How This Lotus Blooms 11122021 - 01222022
Number of Works in Group: 7

- Titles of Works: In the Shadows - A Prelude,
What was Found,
Blind Faith,
Wanna Be,
Merica,
This Lifetime,
Room Enough to Receive It

Completion/Publication

Year of Completion: 2022
Earliest Publication Date in Group: November 12, 2021
Latest Publication Date in Group: January 22, 2022
Nation of First Publication: United States

Author

- Author: Ronisha Sharde Gaines
Pseudonym: Sade
Author Created: text
Citizen of: United States
Domiciled in: United States
Year Born: 1986

Copyright Claimant

Copyright Claimant: Ronisha Sharde Gaines

1271 MONUMENT BLVD, APT 37, Concord, CA, 94520, United States

Rights and Permissions

Name: Ronisha Sharde Gaines
Email: beboldbeautifully@gmail.com
Telephone: (925)206-8125
Address: 1271 Monument Blvd
Apt 37
Concord, CA 94520 United States

Certification

Name: Ronisha Sharde Gaines
Date: February 26, 2022

Correspondence: Yes
Copyright Office notes: Regarding group registration: A group of literary works may be registered in Class TX under 37 C.F.R. 202.4(j) if the following requirements have been met: 1) All the works must be short online literary works as defined in 37 C.F.R. 202.4(j), 2) the group may include up to fifty works, 3) all the works must be published online within a period of three calendar months, and the applicant must provide the earliest and most recent publication date, 4) a title must be provided for each work and for the group as a whole, 5) all the works must be created by the same author or the same joint authors, 6) the works must not be works made for hire, 7) the author(s) must be named as the copyright claimant(s) for each work, and 8) the authorship claimed in each work must be limited to the text.